

ORIGINIAL

Civil Action NO.

4:20-cv-00800-O

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| U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION | |
| CTI | DEC - 7 2020 |
| CLERK, U.S. DISTRICT COURT By <i>M. R. S.</i> Deputy | |

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

HONORABLE JUDGE REED O'CONNOR

NAKISHA JACKSON,

PLAINTIFF

V.

UPM SERVICE CORP

DEFENDANT

MOTION TO SET A HEARING DATE

NAKISHA JACKSON/PRO SE
PO BOX 202967
ARLINGTON, TX 76006
817-240-1571

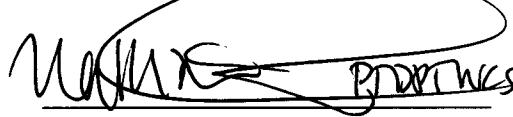
MOTION TO SET A HEARING DATE

I, NaKisha Jackson, respectfully submit motion to set a hearing date in the above-captioned matter. In support of this motion, the petitioner states as follows:

1. NaKisha Jackson filed SUMMARY JUDGEMENT on November 2, 2020.
2. The factual and legal issues have been extensively explained in the amended complaint and Summary Judgment
3. As set forth in the accompanying memorandum, the defendants had ample time to discover while they awaited jurisdictional clearing.
4. Alternatively, should the Court determine that it could rule in my favor on the summary judgment filed, without a hearing, I, NaKisha Jackson, respectfully request that the Court, at its earliest convenience, enter the proposed Order submitted with the motion for summary judgment.

WHEREFORE, I, NaKisha Jackson, respectfully request that the Court set the earliest possible hearing date.

Respectfully submitted,



NaKisha Jackson
12/01/2020

MEMORANDUM IN SUPPORT OF
MOTION TO SET A HEARING DATE

I, NaKisha Jackson, request an order on summary judgement, as the court and the defendant are already abreast of my claims. My attempts to resolve this matter outside of court have been unanswered. Since December 30, 2019, I have made several attempts to seek remedy outside of formal litigation. These proceedings have made all parties aware, and I have yet to be contacted by this company or its legal representation. Jurisdictional concerns are remedied. All parties have been served.



Dr. NaKisha Jackson, PT, DPT, WCS
12/01/2020

Dr. NaKisha Jackson, PT, DPT, WCS

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V.

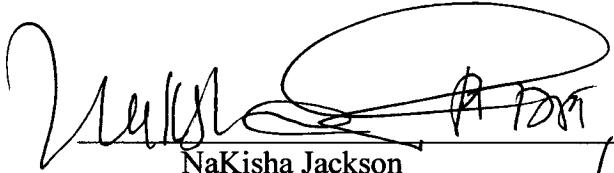
**UPM SERVICE CORP
DEFENDANT**

CERTIFICATE OF SERVICE

I certify that all parties listed below were notified, in a timely fashion, of motion to set hearing date with memo on 12/04/2020.

UPM Service Corp
1501 Yamato Rd
Ste 200 W
Boca Raton, FL 33431

For notification purposes only, as the registered agent of UPM Service Corp:
Unified Women's Healthcare of Texas
15303 N. Dallas Pkwy
Ste 650
Addison, TX 75001


NaKisha Jackson

A. Tom WCS
12/04/2020

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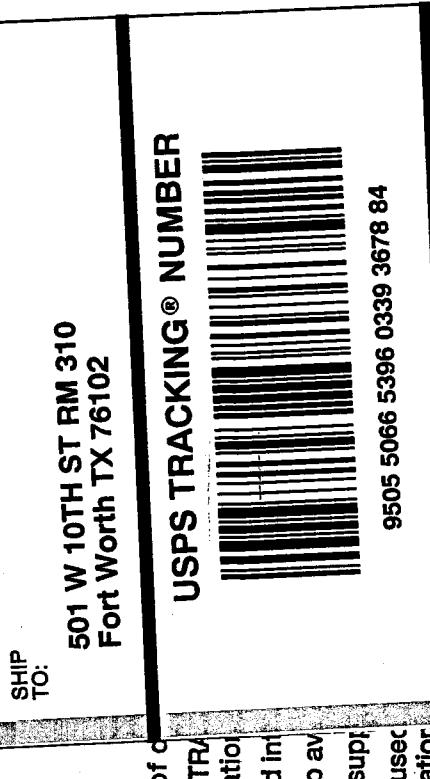
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FORT WORTH DIVISION
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FORT WORTH TX
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